

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE; DR.  
ANDREA WESLEY; DR. JOSEPH WESLEY;  
ROBERT EVANS; GARY FREDERICKS;  
PAMELA HAMNER; BARBARA FINN; OTHO  
BARNES; SHIRLINDA ROBERTSON; SANDRA  
SMITH; DEBORAH HULITT; RODESTA  
TUMBLIN; DR. KIA JONES; MARCELEAN  
ARRINGTON; VICTORIA ROBERTSON,

*Plaintiffs,*

vs.

STATE BOARD OF ELECTION  
COMMISSIONERS; TATE REEVES, *in his official  
capacity as Governor of Mississippi*; LYNN FITCH,  
*in her official capacity as Attorney General of  
Mississippi*; MICHAEL WATSON, *in his official  
capacity as Secretary of State of Mississippi*,

*Defendants,*

AND

MISSISSIPPI REPUBLICAN EXECUTIVE  
COMMITTEE,

*Intervenor-Defendant.*

**CIVIL ACTION NO.  
3:22-cv-734-DPJ-HSO-LHS**

**PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO FILE PETITION FOR AWARD OF ATTORNEYS' FEES**

Plaintiffs Mississippi State Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Marcelean Arrington, and Victoria Robertson (“Plaintiffs”)

respectfully move for a 60-day extension in the time to file a motion for an award of attorneys' fees and costs. Defendants and the Intervenor-Defendant do not oppose this motion.

On May 7, 2025, this Court entered a final judgment in favor of Plaintiffs and against Defendants. ECF No. 263. Plaintiffs intend to move this Court for attorneys' fees and costs incurred in this action pursuant to Federal Rule of Civil Procedure ("FRCP") 54(d)(2)(b), 52 USC § 10310, and 42 USC § 1988. Under Federal Rules 54(b), the Court is empowered to set a date certain by which motions for attorneys' fees must be filed. Absent an order from the Court, the default deadline for Plaintiffs to file a motion seeking attorneys' fees is May 21, 2025, fourteen days after the entry of judgment.

The requested relief is consistent with FRCP 54(d)(2), which states that a court order may dictate the timing of a motion for attorney's fees, and with Local Rule 7(b)(4), which permits parties to seek extensions of time in writing from the court. Further, there is good cause for the Court to grant Plaintiffs' request. Plaintiffs have been represented by attorneys, paralegals, and legal support staff from no fewer than six organizations<sup>1</sup> in a complex action spanning almost two and a half years. Adding to this complexity, at least two attorneys involved in this litigation will be on trial beginning May 19, 2025, one other attorney is on leave, and at least two others have changed jobs.

Due to the complexity of this litigation and the substantial coordination of scheduling and billing among Plaintiffs' counsel that is required, Plaintiffs respectfully request that this Court grant a 60-day extension to July 21, 2025, to allow Plaintiffs' counsel to prepare their motion for

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<sup>1</sup> Including the ACLU of Mississippi, the ACLU, the Mississippi Center for Justice, the Lawyers' Committee for Civil Rights Under Law, the Law Offices of Carroll Rhodes, and Morgan, Lewis, and Bockius, LLP.

attorneys' fees. Plaintiffs further respectfully request that the requirement of a separate memorandum of law under Local Rule 7(b)(4) be waived for this short, unopposed motion.

Respectfully submitted,

This the 12th day of May.

/s/: Joshua Tom

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**CERTIFICATE OF SERVICE**

I, Joshua Tom, do certify that on this day I caused to be served a true and correct copy of the foregoing by electronic mail to all counsel of record.

This the 12th day of May 2025.

/s/ Joshua Tom  
Joshua Tom